

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARILYN GAYE PIETY FOLEY	:	CIVIL ACTION NO.:
	:	2:22-cv-01777-WB
Plaintiff,	:	
	:	
v.	:	
	:	
DREXEL UNIVERSITY and	:	
ROGER KURTZ,	:	
	:	
Defendants.	:	
	:	

**DEFENDANT DREXEL UNIVERSITY’S MOTION FOR STAY OF EXECUTION
OF JUDGMENT AND PROCEEDINGS TO ENFORCE IT PENDING
POST-TRIAL MOTIONS AND APPEAL WITHOUT A BOND**

Defendant, Drexel University, by and through its counsel, Lamb McErlane PC and Tucker Law Group, moves this Honorable Court to stay enforcement of and execution on the January 31, 2025 judgment in the above-captioned matter¹ pending the outcome of post-trial motions and appellate review, without requiring a supersedeas bond to be posted, and, in support, hereby incorporates its Brief in Support of the Motion for Stay of Execution on a Judgment and Proceedings to Enforce It Pending Post-Trial Motions and Appeal Without a Bond as though fully set forth at length.²

¹ The judgment was entered only against Drexel University. Prior to trial, summary judgment was granted in favor of Roger Kurtz. The instant motion is therefore filed on behalf of Drexel University only.

² Drexel respectfully requests that if the Court does not decide the motion by Monday, March 3, 2025, that it issue an order staying execution on the judgment and proceedings to enforce it pending its decision on this motion. Additionally, it is respectfully requested, in the alternative, that the Court provide a reasonable time after any denial of the motion within which Drexel may post a bond or other adequate security.

Respectfully submitted,

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Date: February 27, 2025

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